

December 1, 2017

The Honorable Sanket Bulsara
United States District Court
For the Eastern District of New York
225 Cadman Plaza East,
Brooklyn, NY 11201

Re: Eric Sorenson v. Sandra Simpson, 15-cv-4614 (AMD) (SMG)

Dear Judge Bulsara:

This letter is in response to a letter motion by pro se defendant Sandra Simpson asking for an adjournment of Your Honor's instruction that, if Ms. Simpson wishes to make a summary judgment motion, she must begin the process by December 5, 2017. The motion also seeks to compel the production of certain documents responsive to defendant's document requests.

First, I would like to point out that this case was filed on July 30, 2015. Since that time, Ms. Simpson hired and discharged two attorneys. She filed an appeal of Judge Donnelly's decision on a motion to dismiss and then withdrew the filing. Ms. Simpson has refused to make any settlement offer whatsoever (despite long sessions with you and another magistrate) and is now refusing to choose a mediator so that the mediation you ordered might go forward. In her letter motion, Ms. Simpson belatedly asks for literally thousands of documents, which have no relevance to the issues in the case long after discovery has closed. For all of these reasons, plaintiff Eric Sorenson opposes an adjournment of more than five days to begin the summary judgment process, which Ms. Simpson says she wishes to pursue.

Alternatively, plaintiff respectfully asks the Court to schedule a non-jury trial of this very straightforward action as soon as possible. This case involves a claim for attorney's fees over a nine-year period, during which plaintiff Sorenson represented defendant Simpson in Federal Court. This representation is not disputed and is, in fact, evidenced by the public docket of the Federal District and Appellate Courts in Washington, D.C. (Exhibit attached). Further, Defendant does not dispute that that she did not fire Mr. Sorenson until six years before the Complaint was served. Trial of this case would take no longer than two or three hours, involve no more than two or three witnesses, and might be accomplished on direct testimony by affidavit. This would take considerably less judicial resources than cross motions for summary judgment. Plaintiff is also concerned about diminution of assets available to pay a judgment.

On the merits of Ms. Simpson's discovery request, the request is not proportional to the needs of the case considering the following: 1) the marginal importance of the material to the claims and defenses in this case; and 2) the substantial cost of time and money to produce the thousands of e-mails between the parties (which Ms. Simpson already has or could easily obtain). As to her request for emails between plaintiff and his brother, these documents have no possible relevance to the issues to be tried. In fact, Ms. Simpson has offered no cogent theory of the case which might support her request.

For the foregoing reasons, plaintiff respectfully asks the Court to deny Ms. Simpson's motion and to proceed to trial as soon as possible.

Yours truly,

/S/

Lorna B. Goodman
Law Office of Lorna B. Goodman
551 Madison Avenue
New York, NY 10022
212-223-7400
glornab@gmail.com
Attorney for Plaintiff Eric Sorenson

APPEAL,CLOSED,TYPE-F

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:00-cv-01722-RMU**

SIMPSON v. SOCIALIST PEOPLES
Assigned to: Judge Ricardo M. Urbina
Demand: \$30,000,000
Case in other court: USCA, 05-07048
Cause: 28:1331 Federal Question: Other Civil Rights

Date Filed: 07/21/2000
Date Terminated: 11/19/2008
Jury Demand: None
Nature of Suit: 360 P.I.: Other
Jurisdiction: Federal Question

Plaintiff

SANDRA JEAN SIMPSON
*Personal Representatives for the Estate
of Dr. Mostafa Fahmy Karim, deceased*

represented by **Eric Christopher Sorenson**
52 East 2nd Street
Brooklyn, NY 11218
(718) 871-3661
Email: ericsorensonesq@gmail.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

ALEXANDER J. SIMPSON
TERMINATED: 01/24/2008

represented by **Eric Christopher Sorenson**
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

**SOCIALIST PEOPLE'S LIBYAN
ARAB JAMAHIRIYA**

represented by **Arman Dabiri Abkenari**
LAW OFFICES OF ARMAN DABIRI
& ASSOCIATES, P.L.L.C.
1725 I Street, NW
Suite 300
Washington, DC 20006
(202) 349-3893
Fax: (202) 349-3895
Email: armandab@att.net
TERMINATED: 04/07/2008
LEAD ATTORNEY

Christopher M. Curran
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005
(202) 626-3643

Fax: (202) 639-9355
 Email: ccurran@whitecase.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Tarrant Hale Lomax
 TARRANT H. LOMAX ESQ., P.C.
 940 Bay Ridge Avenue
 Annapolis, MD 21403
 (410) 267-6151
 Fax: (410) 263-6785
 Email: lomaxlaw@comcast.net
TERMINATED: 10/11/2001
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Francis A. Vasquez , Jr.
 WHITE & CASE LLP
 701 Thirteenth Street, NW
 Washington, DC 20005
 (202) 626-3603
 Fax: (202) 639-9355
 Email: fvasquez@whitecase.com
ATTORNEY TO BE NOTICED

Nicole Erb
 WHITE & CASE LLP
 701 13th Street, NW
 Washington, DC 20005
 (202) 626-3694
 Fax: (202) 639-9355
 Email: nerb@whitecase.com
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
07/21/2000	<u>1</u>	COMPLAINT filed by plaintiff SANDRA JEAN SIMPSON (bm) (jpb). (Entered: 07/24/2000)
07/21/2000		SUMMONS (1) issued for defendant SOCIALIST PEOPLES (bm) (Entered: 07/24/2000)
11/09/2000	2	RETURN OF SERVICE/AFFIDAVIT of summons and complaint unexecuted as to defendant SOCIALIST PEOPLES (tb) (Entered: 11/14/2000)
11/14/2000	3	REQUEST by plaintiff SANDRA JEAN SIMPSON for the Clerk to perfect service of summons, complaint, amended complaint and notice of suit together with translation of each by registered mail, via the Department of State, upon Abdel Rahman Mohammed Shalgam, Foreign Minister, Tripoli, Libya, pursuant to 28 U.S.C. 1608(a)(4) (tb) (Entered: 11/14/2000)

03/27/2001	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 1/25/01 upon defendant SOCIALIST PEOPLES (td) (Entered: 03/29/2001)
03/27/2001	5	AFFIDAVIT in support of default by plaintiff SANDRA JEAN SIMPSON; attachment (1) (td) Modified on 03/29/2001 (Entered: 03/29/2001)
03/27/2001	7	MOTION filed by plaintiff SANDRA JEAN SIMPSON for entry of default as to SOCIALIST PEOPLES (td) (Entered: 03/29/2001)
03/27/2001	8	MOTION filed by plaintiff SANDRA JEAN SIMPSON for default judgment against SOCIALIST PEOPLES (td) (Entered: 03/30/2001)
03/27/2001	9	MOTION filed by plaintiff SANDRA JEAN SIMPSON for hearing on default judgment. (td) (Entered: 03/30/2001)
03/29/2001	6	DEFAULT vs. defendant SOCIALIST PEOPLES By Clerk (N) (td) (Entered: 03/29/2001)
04/05/2001	10	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 1/22/01 upon defendant SOCIALIST PEOPLES (td) (Entered: 04/18/2001)
04/24/2001	<u>11</u>	ORDER by Judge Ricardo M. Urbina : granting motion for hearing on default judgment. [9-1] by SANDRA JEAN SIMPSON scheduling default judgment hearing for 10:30 11/13/01 ; (N) (jwd) (Entered: 04/24/2001)
05/02/2001	13	RETURN OF SERVICE/AFFIDAVIT of summons and complaint executed on 4/24/01 upon defendant SOCIALIST PEOPLES (td) (Entered: 05/08/2001)
05/04/2001	12	MOTION filed by defendant SOCIALIST PEOPLES to reopen , and to extend time to 5/31/01 to answer complaint [1-1] (aet) (Entered: 05/07/2001)
05/09/2001	14	ERRATA by Kief James Sorenson notice of filing of minor amendment to the transmittal list regarding affidavit of service via DHL. (td) (Entered: 05/15/2001)
05/18/2001	15	RESPONSE by plaintiff SANDRA JEAN SIMPSON in opposition to motion to reopen [12-1] by SOCIALIST PEOPLES, motion to extend time to 5/31/01 to answer complaint [1-1] [12-2] by SOCIALIST PEOPLES.; exhibits (A-J) (aet) (Entered: 05/21/2001)
05/29/2001	16	REPLY by defendant SOCIALIST PEOPLES in further support of motion to reopen [12-1] by SOCIALIST PEOPLES, motion to extend time to 5/31/01 to answer complaint [1-1] [12-2] by SOCIALIST PEOPLES; affidavit (1) (aet) Modified on 06/04/2001 (Entered: 06/04/2001)
06/15/2001	17	MOTION filed by defendant SOCIALIST PEOPLES to vacate default ; attachment (1) (td) (Entered: 06/18/2001)
06/18/2001	<u>18</u>	MEMORANDUM OPINION by Judge Ricardo M. Urbina granting defendant's motion to reopen and to extendtime to answer; dismissing without prejudice the defendant's motion to vacate default judgment. (N) (jwd) (Entered: 06/18/2001)
06/18/2001	<u>19</u>	ORDER by Judge Ricardo M. Urbina : dismissing without prejudice motion to vacate default judgment [17-1] by SOCIALIST PEOPLES, granting motion to

		reopen [12-1] by SOCIALIST PEOPLES, granting motion to extend time to 7/23/01 to answer complaint [1-1] [12-2] by SOCIALIST PEOPLES; the answer is extended to 7/23/01 for PEOPLES status hearing set for 11:30 9/27/01 (N) (jwd) (Entered: 06/18/2001)
07/09/2001	<u>20</u>	ORDER by Judge Ricardo M. Urbina : the status hearing set for 9/27/01 is vacated and the status hearing has been reset for 1:30 10/15/01 (N) (adc) (Entered: 07/09/2001)
07/23/2001	21	MOTION filed by defendant SOC. PEOPLE'S LIBYAN to dismiss complaint [1-1] ; addendum (1-4) (aet) (Entered: 07/24/2001)
08/06/2001	22	ATTORNEY APPEARANCE for plaintiff SANDRA JEAN SIMPSON by Eric Christopher Sorenson (td) Modified on 08/10/2001 (Entered: 08/10/2001)
08/06/2001	23	MEMORANDUM by plaintiff SANDRA JEAN SIMPSON in opposition to motion to dismiss complaint [1-1] [21-1]; exhibits (4) (td) (Entered: 08/10/2001)
08/27/2001	25	MOTION filed by defendant SOC. PEOPLE'S LIBYAN to extend time to 9/7/01 within which to file a memorandum in reply to plaintiff's opposition to defendant's motion to dismiss. (td) (Entered: 08/28/2001)
08/28/2001	24	ORDER by Judge Ricardo M. Urbina: extending time until 8/31/01 at 3:00 p.m. for defendant to reply to plaintiff's opposition to defendant's motion to dismiss (N) (jwd) (Entered: 08/28/2001)
09/17/2001	26	MOTION filed by defendant SOC. PEOPLE'S LIBYAN for leave to withdraw Tarrant Hale Lomax as attorney for SOC. PEOPLE'S LIBYAN (td) (Entered: 09/19/2001)
09/17/2001	27	NOTICE by defendant SOC. PEOPLE'S LIBYAN regarding withdrawal of counsel. (td) (Entered: 09/19/2001)
10/04/2001	28	MOTION filed by plaintiff SANDRA JEAN SIMPSON to vacate status hearing. (td) (Entered: 10/09/2001)
10/10/2001	31	ATTORNEY APPEARANCE for defendant SOC. PEOPLE'S LIBYAN by Arman Dabiri Abkenari (aet) (Entered: 10/15/2001)
10/10/2001	32	MOTION filed by defendant SOC. PEOPLE'S LIBYAN to continue status conference scheduled for 10/15/01 to 11/6/01 at 2:00 p.m. (aet) (Entered: 10/15/2001)
10/11/2001	<u>29</u>	ORDER by Judge Ricardo M. Urbina : granting motion for leave to withdraw Tarrant Hale Lomax as attorney for SOC. PEOPLE'S LIBYAN [26-1] by SOC. PEOPLE'S LIBYAN; directing that the appearance of counsel for defendants be, and the same hereby is stricken (N) (jwd) (Entered: 10/11/2001)
10/11/2001	<u>30</u>	ORDER by Judge Ricardo M. Urbina : granting motion to vacate status hearing. [28-1] by SANDRA JEAN SIMPSON scheduling an initial status hearing set for 2:00 11/6/01 (N) (jwd) (Entered: 10/11/2001)
10/31/2001	<u>33</u>	MEMORANDUM OPINION by Judge Ricardo M. Urbina denying motion of defendant to dismiss (N) (jwd) (Entered: 11/01/2001)

10/31/2001	<u>34</u>	ORDER by Judge Ricardo M. Urbina : denying motion to dismiss complaint [1-1] [21-1] by SOC. PEOPLE'S LIBYAN (N) (jwd) (Entered: 11/01/2001)
11/06/2001		STATUS HEARING before Judge Ricardo M. Urbina: defendant will appeal the order denying the defendant's motion to dismiss; case stayed until resolution of the defendant's appeal; no further dates scheduled at this time. Reporter: William D. McAllister (jwd) (Entered: 11/06/2001)
11/06/2001	<u>35</u>	ORDER by Judge Ricardo M. Urbina: staying case until resolution of the defendant's appeal; plaintiff may depose Robert Upp during the stay; if the defendant fails to serve this court with a notice of appeal by 12/6/01, this order will be vacated and the court will shcedule a status hearing for the earlies possible date (N) (jwd) (Entered: 11/06/2001)
11/06/2001	36	MEET AND CONFER STATEMENT/REPORT PURSUANT TO L.R. 16 filed by plaintiff SANDRA JEAN SIMPSON, defendant SOC. PEOPLE'S LIBYAN . (td) (Entered: 11/07/2001)
11/16/2001	37	NOTICE OF APPEAL by defendant SOC. PEOPLE'S LIBYAN from order [34-1] , entered on: 11/1/01. \$105.00 fee paid; copy mailed to parties. (td) (Entered: 11/20/2001)
11/16/2001		TRANSMITTED PRELIMINARY RECORD on appeal [37-1] by SOC. PEOPLE'S LIBYAN to U.S. Court of Appeals (td) (Entered: 11/20/2001)
11/20/2001	38	LETTER pursuant to FRAP 10(b) regarding transcript (bm) (Entered: 11/26/2001)
11/29/2001		USCA # 01-7191 assigned for appeal [37-1] by SOC. PEOPLE'S LIBYAN (td) (Entered: 12/06/2001)
06/04/2003	39	CERTIFIED COPY of judgment filed in USCA dated 4/22/03, on appeal [37-1], affirming in part the judgment of USDC , reversing in part the judgment of USDC vacating in part and remanding for further proceedings. USCA # 01-7191 (cp) (Entered: 06/05/2003)
06/17/2003	<u>40</u>	ORDER by Judge Ricardo M. Urbina: directing that a joint status report and a proposed scheduling order be submitted by 8/10/03; scheduling an interin status conference for 9/22/03 at 10:00 a.m.; interim status hearing set for 10:00 9/22/03 (N) (jwd) (Entered: 06/17/2003)
06/17/2003		Case Reopened (jwd) (Entered: 06/17/2003)
08/08/2003	41	JOINT MOTION by plaintiff SANDRA JEAN SIMPSON, defendant SOC. PEOPLE'S LIBYAN to extend time to file status report to a later date , and to continue the scheduling conference set for 8/10/03 to a later date (bjsp) (Entered: 08/13/2003)
08/14/2003	<u>42</u>	ORDER by Judge Ricardo M. Urbina : granting joint motion to extend time to file status report to a later date [41-1] by SOC. PEOPLE'S LIBYAN, SANDRA JEAN SIMPSON; parties to submit a joint status report and proposed scheduling order 30 days from plaintiff's filing of its amended complaing; vacating interim status conference set for 9/22/03. (N) (jwd) (Entered: 08/14/2003)

10/31/2003	<u>43</u>	AMENDED COMPLAINT against THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA , filed by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Attachments: # <u>1</u>)(td,) (Entered: 11/03/2003)
12/01/2003	<u>44</u>	STATUS REPORT <i>Status Report per Local Rule 16.3</i> by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Sorenson, Eric) (Entered: 12/01/2003)
12/31/2003	<u>45</u>	MOTION to Dismiss for Lack of Jurisdiction , <i>personal jurisdiction and failure to state a claim</i> by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA. (Attachments: # <u>1</u> Text of Proposed Order # <u>2</u> Appendix A# <u>3</u> Appendix B# <u>4</u> Appendix C# <u>5</u> Appendix D# <u>6</u> Appendix E# <u>7</u> Appendix F# <u>8</u> Appendix G)(Dabiri Abkenari, Arman) (Entered: 12/31/2003)
01/12/2004	<u>46</u>	Memorandum in opposition to motion re <u>45</u> filed by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Attachments: # <u>1</u> Affidavit Affirmation of Service# <u>2</u> Text of Proposed Order)(Sorenson, Eric) (Entered: 01/12/2004)
01/19/2004	<u>47</u>	REPLY in support of motion re <u>45</u> to <i>Dismiss</i> filed by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA. (Attachments: # <u>1</u> Cicippio-Puleo v Iran)(Dabiri Abkenari, Arman) (Entered: 01/19/2004)
06/10/2004	<u>48</u>	NOTICE by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA of <i>Recent Authority</i> (Attachments: # <u>1</u> Exhibit Acree v Iraq (DC CIR))(Dabiri Abkenari, Arman) (Entered: 06/10/2004)
06/16/2004	<u>49</u>	ENTERED IN ERROR.....NOTICE by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON <i>Reply to Defendant's Notice of Recent Authority</i> (Sorenson, Eric) Modified on 6/17/2004 (rje,). (Entered: 06/16/2004)
06/17/2004		NOTICE OF CORRECTED DOCKET ENTRY. Document No. 49 was entered in error and counsel was instructed to refile said pleading as a Response. (rje,) (Entered: 06/17/2004)
06/17/2004	<u>50</u>	RESPONSE <i>Planitiffs' Response to Defendant's Notice of Recent Authority</i> filed by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Sorenson, Eric) (Entered: 06/17/2004)
08/03/2004	<u>51</u>	ORDER directing the plaintiff to provide supporting evidence. Signed by Judge Ricardo M. Urbina on 8/3/04. (Entered: 08/03/2004)
08/13/2004	<u>52</u>	MOTION for Extension of Time to File <i>Jurisdictional Discovery</i> by <i>Gpps</i> ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Attachments: # <u>1</u> # <u>2</u>)(Sorenson, Eric) (Entered: 08/13/2004)
08/16/2004		MINUTE ORDER granting <u>52</u> Motion for Extension of Time to File. The plaintiff shall have until November 1, 2004 to file supplemental materials, and the defendant shall have 30 days to respond to the plaintiff's filing. A further briefing schedule, if necessary, will be set thereafter. The defendant's pending motion to dismiss is administratively closed pending receipt of the plaintiff's supplemental briefing. Signed by Judge Ricardo M. Urbina on 8/16/04. (Entered: 08/16/2004)

08/18/2004		Set/Reset Deadlines:, Set/Reset Hearings: Supplemental Materials are due by 11/1/2004. (jwd) (Entered: 08/18/2004)
09/24/2004	<u>53</u>	MOTION for Order <i>To Include Case Material in Record</i> by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Attachments: # <u>1</u> # <u>2</u> # <u>3</u>)(Sorenson, Eric) (Entered: 09/24/2004)
10/06/2004	<u>54</u>	MOTION for Extension of Time to <i>Submit Jurisdictional Discovery</i> by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON. (Attachments: # <u>1</u> Affirmation of Eric Sorenson)(Sorenson, Eric) (Entered: 10/06/2004)
10/06/2004		MINUTE ORDER denying <u>53</u> Motion for Order, granting <u>54</u> Motion for Extension of Time. The court cannot put materials from chamber's file from another case into the docket of this case. As to the extension of time, in the interest of ascertaining subject-matter jurisdiction, the court grants the plaintiffs' second motion for extension of time. Accordingly, the plaintiffs shall have until 5pm on November 29, 2004 to submit jurisdictional discovery materials to the court. The plaintiffs shall insure that, in addition to filing these materials electronically (if the plaintiffs use ECF), a courtesy copy of these materials arrives at chambers by the new deadline. No further extensions will be granted, and materials submitted after the November 29 deadline will not be considered in ruling on the defendant's motion to dismiss. Signed by Judge Ricardo M. Urbina on 10/6/04. (Entered: 10/06/2004)
10/07/2004	<u>55</u>	Letter from Eric C. Sorenson, Esquire to Mr. Panas, Judge Urbina's Law Clerk regarding discovery materials in the Kilburn case. "fiat" (jwd) (Entered: 10/07/2004)
11/29/2004	<u>56</u>	RESPONSE to Discovery Request by ALEXANDER J. SIMPSON, SANDRA JEAN SIMPSON.(Sorenson, Eric) (Entered: 11/29/2004)
12/02/2004		MINUTE ORDER. In a minute order dated 8/16/04, the court provided the defendant 30 days to respond to the plaintiff's jurisdictional discovery submissions. In light of the plaintiff's motions for extension of time, the new deadline for the defendant to respond is 1/3/05. If the defendant wishes to modify this deadline, it should submit a motion, ideally with the plaintiff's consent. Signed by Judge Ricardo M. Urbina on 12/02/04. (jp,) (Entered: 12/02/2004)
12/03/2004	<u>57</u>	MOTION for Extension of Time to <i>respond</i> by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIYA. (Attachments: # <u>1</u> Text of Proposed Order) (Dabiri Abkenari, Arman) (Entered: 12/03/2004)
12/03/2004		MINUTE ORDER granting <u>57</u> Motion for Extension of Time. The defendant's deadline to respond is moved to 2/4/05. Signed by Judge Ricardo M. Urbina on 12/3/04. (jp,) (Entered: 12/03/2004)
12/03/2004		Set Deadlines/Hearings: Response to Dispositive Motions due by 2/4/2005. (jwd) (Entered: 12/03/2004)
02/04/2005	<u>58</u>	MOTION to Dismiss by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIYA. (Attachments: # <u>1</u> Text of Proposed Order)(Dabiri Abkenari, Arman) (Entered: 02/04/2005)

02/07/2005	<u>59</u>	MOTION to Strike <i>Defendant's Motion to Dismiss</i> by SANDRA JEAN SIMPSON, ALEXANDER J. SIMPSON. (Attachments: # <u>1</u> # <u>2</u>)(Sorenson, Eric) (Entered: 02/07/2005)
02/08/2005		MINUTE ORDER denying <u>59</u> Motion to Strike. The court will construe the defendant's submission as a response to the plaintiffs' jurisdictional discovery materials and will limit its analysis accordingly. However, to avoid administrative confusion, the defendant is hereby instructed to withdraw its recently filed "motion" and to refile that same document by no later than 2/9/05 as a "response." Other than relabeling its filing, the defendant is to make no other revisions to the document. Signed by Judge Ricardo M. Urbina on 2/8/05. (jp,) (Entered: 02/08/2005)
02/08/2005	<u>60</u>	RESPONSE to [] filed by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA. (Attachments: # <u>1</u>)(Dabiri Abkenari, Arman) (Entered: 02/08/2005)
02/09/2005		MINUTE ORDER withdrawing <u>58</u> Motion to Dismiss. Signed by Judge Ricardo M. Urbina on 2/8/05. (jp,) (Entered: 02/09/2005)
02/11/2005	<u>61</u>	MOTION for Leave to File <i>Reply to Defendant's Response</i> by SANDRA JEAN SIMPSON, ALEXANDER J. SIMPSON. (Attachments: # <u>1</u>)(Sorenson, Eric) (Entered: 02/11/2005)
02/11/2005		ORDER granting <u>61</u> Motion for Leave to File. Reply due 2/22/05. Signed by Judge Ricardo M. Urbina on 2/11/05. (jp,) (Entered: 02/11/2005)
02/22/2005	<u>62</u>	REPLY to <i>Defendant's Response to Jurisdictional Discovery</i> filed by SANDRA JEAN SIMPSON, ALEXANDER J. SIMPSON. (Sorenson, Eric) (Entered: 02/22/2005)
03/07/2005	<u>65</u>	ORDER denying the defendant's motion to dismiss <u>45</u> and granting the plaintiffs leave to amend. Signed by Judge Ricardo M. Urbina on 3/7/05. (jp,) (Entered: 03/07/2005)
03/07/2005	<u>64</u>	MEMORANDUM OPINION. Signed by Judge Ricardo M. Urbina on 3/7/05. (jp,) Additional attachment(s) added on 3/7/2005 (jp,). (Entered: 03/07/2005)
03/21/2005	<u>66</u>	SECOND AMENDED COMPLAINT against THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA filed by SANDRA JEAN SIMPSON, ALEXANDER J. SIMPSON. (Attachments: # <u>1</u> Notice of Second Amended Complaint# <u>2</u> Affirmation of Service)(nmw,) (Entered: 03/21/2005)
04/01/2005	<u>67</u>	NOTICE OF APPEAL as to <u>65</u> Order by THE SOCIALIST PEOPLE'S LIBYAN ARAB JAMAHIRYA. Filing fee \$ 255, receipt number 133313. (jf,) (Entered: 04/04/2005)
04/04/2005		Transmission of Notice of Appeal and Docket Sheet to US Court of Appeals re <u>67</u> Notice of Appeal (jf,) (Entered: 04/04/2005)
04/05/2005	<u>68</u>	MOTION to Strike <i>Defendant's Notice of Appeal</i> by SANDRA JEAN SIMPSON, ALEXANDER J. SIMPSON. (Attachments: # <u>1</u>)(Sorenson, Eric) (Entered: 04/05/2005)
04/07/2005	<u>69</u>	